

(This form is intended to be used by persons who are not represented by an attorney. The form should NOT be used by a prisoner who is filing a complaint under the Civil Rights Act, 42 U.S.C. § 1983. A separate form is obtainable for prisoners.)

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

4:04-CV-00630-REL

~~DARNELL ALLEN BROWDER~~

DARRYL KEITH BROWDER

(Enter above the FULL name of each
plaintiff in this action)

vs.

COMPLAINT

SPO CAM #933, ERIN COSTANZO,
HARDY #4881, S.WISSINK #903,
DES MOINES POLICE DEPARTMENT
25 EAST FIRST STREET DES MOINES,
IOWA 50309.

(Enter above the FULL name of each
defendant in this action)

ON JULY 13th 2003, OFFICER ERIN COSTANZO, STOPED PLAINTIFF DARNELL BROWDER, SHE WAS TALKING TO ME AND MY GIRL FRIEND ROBIN RIVERA, SHE SEEN

ME RUN FOR MY LIFE. OFFICERS SPO CAM AND OFFICER HARDY #4881 got OUT OF THEIR CAR AND SAID WE ARE GOING TO BEAT YOUR ASS. I AS DARNELL A. BROWDER, RAN TO MY GRAND FATHER APPARTMENT THESE OFFICERS COUGHT ME AND WHEN THEY PUT MY HAND CUFFS ON ME THEY HIT ME ALL IN BACK OF MY HEAD OVER AND OVER AGAIN WITH THEIR FLASH LIGHTS. OFFICER COSTANZO AND ROBIN RIVERA HEARD THE BEATTINGS ON THE POLICE INTER COME, I AS DARNELL A. BROWDER, WAS ALMOST KNOCKED OUT FROM THE BEATTINGS. I WAS FALSELY ARRESTED. THESE COPS BE HARASSING ME AND MY UNCLE DARRYL KEITH BROWDER, MY UNCLE TALKED TO THE INTERNAL AFFAIRS. BOTH OFFICERS SPO CAM # 933, AND S. WISSINK #903, RAN MY UNCLE OFF THE ROAD IN HIS CAR RIGHT INFRONT OF ALOT OF

witnesses in front of my Grand mother House at 1817 14th Street Des Moines, Iowa 50314. these officers was letting my Uncle Darryl know to keep quiet.

Parties

(In item A below, place your name in the first blank and place your present address and phone number in the second blank. In the third blank write the state where your home is ("Home State"). In item B below, do the same for additional plaintiffs, if any.)

A. Name of Plaintiff DARNELL ALLEN BROWDER.
Address & Phone number 1925 10th street DES MOINES, IOWA 50314.
Home State PHONE NUMBER 515-243-1414 DES MOINES, IOWA

B. Additional Plaintiffs (include addresses, phone numbers and home states)
DARRYL KEITH BROWDER, 1925 10th STREET DES MOINES, IOWA 50314.
PHONE NUMBER 515-243-1414.

(In item C below, place the **FULL** name of the defendant in the first blank place the address and phone number for the defendant in the second blank. In the third blank, write the state in which the defendant has his/her home. If the defendant is a corporation, list the location of its home office, and the state where it is incorporated, if known. If the defendant is a government agency, simply name it. In item D, do the same for additional defendants, if any.)

C. Name of defendant spo cam #933. erin costanzo, hardy #4881,
Address & Phone number DES MOINES POLICE DEPARTMENT 25 EAST FIRST STREET
50309
Home State DES MOINES, IOWA

D. Additional Defendants (include addresses, phone numbers and home states)
S.WISSINK #903, and the DES MOINES POLICE DEPARTMENT
DES MOINES, IOWA 50309

DES MOINES, IOWA HOME STATE

Statement of Claim

(State here as briefly as possible the **FACTS** of your case. You **MUST** state **EXACTLY** what each defendant personally did, or failed to do, which resulted in harm to you. State the date **AND** place of all events. Attach an extra sheet if necessary, and write the heading "Part II Continued" at the top of the sheet. Keep to the facts. Do not give any legal arguments or cite any cases.)

OFFICERS HARDY #4881, SPO CAM #933, AND S.WISSINK #903, failed to
ME
PROTECTED FROM HARM. ALSO THESE OFFICERS SEE ME AND MY UNCLE DARRYL
K. BROWDER, AND STOP US BOTH AND MAKE ILLEGAL SEARCHES AND SEIZURE
STOPS. I WAS BEATED SO BAD I ALMOST DIED. WHEN I GOT RELEASED FROM
POLK COUNTY JAIL, TWO DAYS LATER I STILL WAS NOT FEELING RIGHT. MY
HEAD WAS HURTTING ME BAD. AND MY NECK, AND MY SHOULDER WAS OUT OF PLACE.
OFFICER ERIN COSTANZO, SHE LIED ON HER REPORT. SHE CLAIMS THAT SHE
HURT HER RING FINGER BY GRABBING MY SHIRT BEFORE I RANED. THIS OFFICER
ERIN COSTANZO, NEVER TOUCHED ME. AND I HAVE A WITNESS, HER NAME IS ROBIN
RIVERA. WHEN I RANED FROM THESE DANGEROUS OFFICERS ERIN COSTANZO MADE
WITNESS ROBIN RIVERA SIT IN HER CAR. THEN WITNESS RIVERA HEARD ON THE
OFFICERS INTER COM HOW THESE OFFICERS WAS BEATING ME. RIVERA ASKED TO GET
OUT OF THE CAR. OFFICER ERIN COSTANZO STATED IF YOU DO NOT LEAVE YOU ARE
If you know, **BRIEFLY** state what **SPECIFIC** law of constitutional provisions defendant(s)
violated.)

FALSE REPORT, AND ILLEGAL SEARCH AND SEIZURE, NEGLIGENCE, AND
HARASSMENT, AND PERSONAL INJURY, AND INTENTIONAL INFLECTION OF
EMOTIONAL DISTRESS, AND POLICE BRUTALITY, DISCRIMINATION, FRAUD,
EXCESSIVE FORCE, , .

GOING TO JAIL. THE WITNESS STATED THAT SHE HEARD ME AS DARNELL A. BROWDER SAY.
NO NO YOU ARE GOING TO GET ME LIKE THIS AND THESE OFFICERS JUST KEPT ON
BEATTING ME WITH THEIR FLASH LIGHTS. THEY ALMOST KILLED ME. I THINK I BLACKED
OUT, I DARNELL A. BROWDER, MUST STATE THAT THESE OFFICERS LISTED GAVE ME A
HEAD INJURY. IN MY MEDICAL RECORDS IT STATES THAT I HAD TO TAKE TYLENOL, AND
NAPROSYN, FOR HEADACHES, FOR SHOULDER SPRAIN TAKE NAPROSYN TWICE A DAY WITH FOOD
FOR TWO WEEKS. RETURN IN 2 DAYS TO RECHECK URINE. ALSO I GOT A BILL FROM
THE DES MOINES FIRE DEPARTMENT. THEY CHARGED ME AS DARNELL A. BROWDER, \$500.00
DOLLARS FOR ALS1 EMERGENCY. AND \$ 7.00 DOLLARS FOR AMBULANCE GROUND MILEAGE
AND \$30.00 DOLLARS FOR OXYGEN. THE TOTAL FOR THE DES MOINES FIRE DEPARTMENT
BILL IS \$ 537.00 DOLLARS. MY HOSPITAL MEDICAL RECORDS SAY HEAD TRAUMA.
THE POLICE REPORT AND THE MEDICAL RECORDS IS ATTACHED FOR EVIDENCE.

Darnell Allen Browder

DARNELL A. BROWDER, DARRYL K. BROWDER

Darryl K. Browder

I AM A WITNESS FOR BOTH PLAINTIFF'S I LESLIE J. BARBER, WILL TESTIFY FOR BOTH
Case 4:04-cv-00630-RAW Document 10 Filed 03/29/05 Page 5 of 7
I DARRYL KEITH BROWDER, WILL TESTIFY THAT THIS IS TRUE IN THE COURT OF LAW.
I DARNELL ALLEN BROWDER, WILL TESTIFY THAT THIS IS TRUE IN A COURT OF LAW.

I DARRYL KEITH BROWDER, MUST SAY THAT I HAD TO CALL A AMBULANCE FOR DARNELL BROWDER, HE WAS SLEEP. BUT SOMETHING WAS WRONG WITH DARNELL A. BROWDER. HIS EYE LIDS WAS OPEN AND HIS EYES WAS ROLLING AROUND IN HIS HEAD AND HIS BREATHING WAS VERY SHORT. TO ME DARNELL ALLEN BROWDER ALMOST STOPED BREATHING. DARNELL WAS ON HIS DEATH BED. THE FIRE DEPARTMENT MEN PUT DARNELL A. BROWDER, on SOME TYPE OF BODY BAG AND TOOK DARNELL OUT TO THE AMBULANCE. HE WAS IN BAD SHAPE. I DARRYL KEITH BROWDER, WENT DOWN TO INTERNAL AFFAIRS AND TALKED TO A OFFICER DOWN THERE. BY TIME I GOT BACK TO MY MOTHER HOME AT 1817 10th STREET IN DES MOINES, IOWA 50314. I SEEN OFFICERS SPO CAM #933, AND OFFICER S. WISSINK #903, OFFICER SPO CAM WAS DRIVING. HE TURNED BEHIND ME AND HE STARTED TAIL GATING ME AS DARRYL K. BROWDER. THEN I PARKED RIGHT INFRONT OF MY MOTHER HOME OFFICER SPO CAM #933 PULLED UP SO CLOSF TO ME HE HIT MY BUMPER . THEN HE PULLED BACK THEN CAME AROUND ME AND SAID DON'T FUCK UP AND KEPT ON GOING. ANOTHER TIME I WAS ON CLARK STREET IN DES MOINES, IOWA 50314. OFFICER SPO CAM AND HIS OFFICER FRIEND S. WISSINK #903, PULLED UP AND CALLED ME OUT OF 8 GUYS HE TOLD ME THAT I LOOKED LIKE SOME GUY WHO ESCAPED FROM SOME INSTITUTION. I DARRYL K. BROWDER HAVE BEEN HARASSED AND MY RIGHTS HAS BEEN VIOLATED. AND DARNELL BROWDER ALMOST GOT KILLED BY THESE TWO OFFICERS WITH OFFICER HARDY #4881 help.

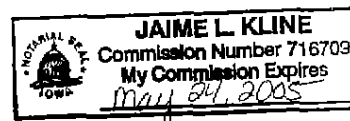
Darnell Allen Browder
Darryl K. Browder
Leslie Barber
signature of defendant

signed this--25th-----day of October-----2004

1925 10th Street
street address

Jaime L. Kline
your signature of notery
public.

Des Moines, IOWA 50314
city state zipe



Relief

(State briefly **EXACTLY** what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

WE WANT THIS COURT TO GRANT US \$8,million DOLLARS FOR PUNITIVE
DAMAGES, AND FOR PAST MEDICAL EXPENSES, PAST PHYSICAL PAIN AND
MENTAL ANGUISH, INCLUDING LOSS OF ENJOYMENT OF LIFE, PAST LOSS OF MIND
AND BODY: NUMERAL DAMAGES; AND FOR LOSS OF WAGES; AND INTENTIONAL
INFLICTION OF EMOTIONAL DESTRESS: AND FOR FALSE REPORT, AND FOR
NEGLIGENCE, HARASSMENT, PERSONAL INJURY, POLICE BRUTALITY, DISCRIMINATION,
Signature(s) of Plaintiff(s) FRAUD, FALSE ARREST, AND ILLEGAL SEARCH AND
SEIZURE, EXCESSIVE FORCE, .

Signed this 15th day of NOVEMBER, 2004.

Darnell Allen Browder

(Signature of Plaintiff)

515-243-1414

(Area code) Phone Number

Signatures and phone numbers of additional plaintiffs, if any:

Darnell K. Browder

515-243-1414

4. Do you have **any** cash or checking or savings accounts? ☐ Yes ☒ No

If "Yes," state the total amount. _____

5. Do you own any real estate, stocks, bonds, securities, other financial instruments, automobiles or any other thing of value? ☒ Yes ☐ No

If "Yes," describe the property and state its value.

I am Darryl/K. Browder, I am buying my house for \$15,000.00 Dollars. The value is about \$36,000.00 Dollars. I have a blue van the value is \$4,000.00 Dollars, and I have a 1995 Cadillac, the value is about \$4,000.00 Dollars. Darnell A. Browder own a Chevy, the value is \$1,500.00.

6. List the persons who are dependent on you for support, state your relationship to each person and indicate how much you contribute to their support. I live with my 6 year old son. I support him, and me only Darryl/K. Browder. my son name is Davion ~~Barber~~.

I declare under penalty of perjury that the above information is true and correct.

11-16-04
Date

Darnell Allen Browder
Darryl Keith Browder
Signature of Applicant

NOTICE TO PRISONER: A Prisoner seeking to proceed IFP shall submit an affidavit stating all assets. In addition, a prisoner must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.